

***Berman Class Law
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March 20, 2018

Via ECF

The Honorable Steven C. Mannion, U.S.M.J.
United States District Court for the District of New Jersey
Martin Luther King, Jr. Bldg. & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: **White et al. v. LG Electronics, Inc., et al.,
Civil Action No. 17-1775 (MCA) (SCM)**

Dear Magistrate Judge Mannion:

I write regarding several items related to the above referenced action.

First, I write to inform the Court that I have legally changed my name to ***Mack Press, Esq.*** I have updated this information with the New Jersey Bar and the United States District Court for New Jersey; the Clerk for the Court has instructed me to now practice law under my new legal name. Although the PACER system has been updated, I write to simply alert the Court as well so that the Court may update its own files.

Second, respecting the March 28, 2018 Rule 26 Conference scheduled before the Court, I write for clarification from the Court in order to help with discussions between counsel regarding submission of a *Proposed Joint Discovery Plan* for that Conference (concerning which counsel for Defendants and I have been discussing). Specifically, counsel for Defendants seeks to stay discovery in this case until the Motion To Dismiss (returnable 4/2/18) is decided. In Your conference call with counsel in January, however, I thought you instructed counsel that Judge Arleo wants discovery in this case “to move along,” notwithstanding whether Defendants were deciding to answer Plaintiffs’ allegations in the Amended Complaint or otherwise.

Thus, in order to submit a proposed Joint Discovery Plan that is appropriate and timely,

could the Court respectfully clarify the Court's position regarding this issue referenced in the paragraph above?

Respectfully submitted,

BERMAN CLASS LAW

By: /s/ Mack Press

MACK PRESS

Cc: Hon. Madeline Cox Arleo, U.S.D.J. (via ECF)
All Counsel of Record (via ECF)